

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RUSSELL BRAMMER,)	
)	
)	
Plaintiff,)	
v.)	Civil Action No.: 1:17-cv-01009-CMH-IDD
)	
VIOLENT HUES PRODUCTIONS, LLC,)	
)	
Defendant.)	
)	

**VIOLENT HUES PRODUCTIONS, LLC’S
OBJECTIONS TO PLAINTIFF’S TRIAL EXHIBITS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(iii) and the schedule established in the Court’s December 1, 2017 Order [ECF No. 15], Violent Hues Productions, LLC (“Violent Hues”) hereby objects to the Trial Exhibits filed by Plaintiff Russell Brammer [ECF No. 47-1]. Violent Hues’ objections are attached hereto as Exhibit 1.

Certain of Violent Hues’ objections will be supported by arguments and caselaw described in Violent Hues’ upcoming motions *in limine*. These objections are provided subject to Violent Hues’ motions. Violent Hues reserves the right to amend its list of objections to take account of any future rulings by the Court.

Violent Hues also reserves the right to amend its objections to any exhibit that is not identical to the exhibit versions filed by Plaintiff on April 19, 2018.

Violent Hues further objects to the foundational relevance of any exhibit identified by Plaintiff until such relevance is established by a sponsoring witness, as required by Fed. R. Evid. 602.

Violent Hues is willing to meet and confer with Plaintiff to resolve the parties’ respective exhibit objections prior to trial.

Dated: April 30, 2018

Respectfully submitted,

/s/ Paul J. Weeks

Judson D. Brown (*pro hac vice*)

Thomas P. Weir (*pro hac vice*)

Paul J. Weeks (VA Bar No.: 89656)

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2018, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Paul J. Weeks

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